COMPLIANCE EVALUATION INSPECTION

CRESCENT PLATING WORKS, INC.
CHICAGO, ILLINOIS

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05031
EPA Region	:	5
Site No.	:	ILD 005 097 621
Date Prepared	:	July 8, 1991
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PRC No.	:	109-R0503148
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TABLE OF CONTENTS

LIST OF FIGURES

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05031 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct Resource Conservation and Recovery Act (RCRA) compliance evaluation inspections (CEI) in Illinois. As part of this assignment, PRC conducted a CEI at the Crescent Plating Works, Inc. (Crescent) facility in Chicago, Illinois.

The objective of the CEI was to determine the facility's compliance with applicable portions of the hazardous waste management regulations of the Illinois Administrative Code (IAC Title 35), corresponding federal regulations (40 CFR Parts 260 through 265, 270, and 271), and the federal land disposal restrictions (LDR) (40 CFR Part 268).

PRC met with the Illinois Environmental Protection Agency (IEPA) Field Operations Section (FOS) and conducted a preinspection file audit on May 14, 1991. IEPA officials provided PRC with copies of state and federal checklists to be completed during the CEI. During the file audit, PRC completed the preinspection files audit checklist, photocopied relevant material, and became acquainted with the facility's operations and regulatory history.

On June 13, 1991, PRC conducted an unannounced CEI at the Crescent facility. The following personnel were present:

- Eileen Porps — Crescent, Office Manager
- Leslie Williams — Crescent, Pollution Treatment Operator
- John Grabs — PRC, Inspection Team Leader
- Laurel Berman — PRC, Inspector

PRC interviewed facility personnel, reviewed facility records, evaluated facility waste management recordkeeping, and inspected facility waste management operations. PRC completed applicable checklists to assist in the compliance evaluation. PRC also took six photographs of significant facility operations and inspection findings.

This report describes inspection findings and evaluates facility regulatory compliance. Completed inspection checklists are provided in Appendix A. A photographic log is provided in Appendix B.

2.0 FACILITY BACKGROUND

This section describes the facility's location, operations, and regulatory status and history.

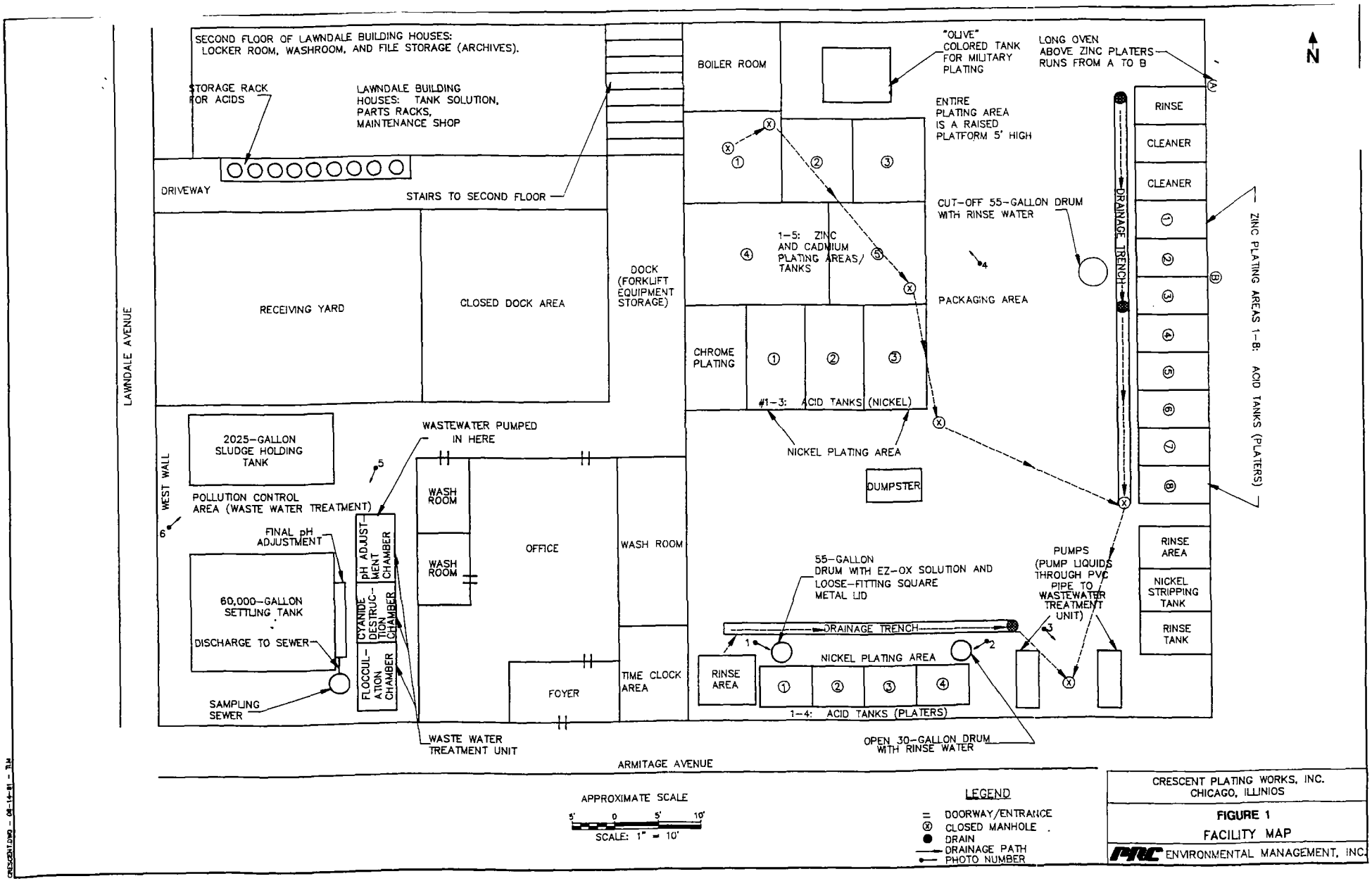
2.1 FACILITY LOCATION

The Crescent facility is located at 3650 West Armitage Avenue in Chicago, Cook County, Illinois. The facility is bounded by Lawndale Avenue to the west, Armitage Avenue to the south, a mixed commercial/industrial/residential area to the east, and a residential area to the north. Both Armitage Avenue and Lawndale Avenue provide access to the facility. The main entrance is on Armitage Avenue.

2.2 FACILITY OPERATIONS

The Crescent facility began operations in 1948 and moved into its current site in 1974. The site previously housed the Metro Electro Processing/Alloy Chrome, Inc. plating operation. This facility moved to Schiller Park, Illinois (Crescent, 1991a). Primary processes include plating steel and brass objects with zinc, cadmium, nickel, chrome, brass, and copper. Typical plated objects include cookware and machinery parts. These objects are plated in large dip tanks that contain an acid solution of plating material. Once plated, objects are rinsed and cleaned in separate tanks. Plating mistakes are stripped with chemical solutions and replated. Nickel plated objects that are mistakes are stripped in a nickel stripping tank. On rare occasions, objects that require special coatings are baked in a large oven. All waste liquids from plating, rinsing, cleaning, and stripping operations flow through floor trenches and are pumped to an on-site wastewater treatment unit. Resulting wastewater sludge is stored in the pollution control area in a large tank.

The Crescent facility is enclosed entirely within two small, connected buildings. The first floor of the main building houses the plating operation, packaging areas, the pollution control area, waste storage areas, and an office. The second is the Lawndale Building. It is used to store raw material and plated parts. The second floor of the Lawndale Building contains a locker room, a washroom, and file storage areas. Figure 1 shows the Crescent facility layout. Crescent employs about 50 people, the majority of them working in the plating/packaging area.



CRESCENT PLATING WORKS, INC.
CHICAGO, ILLINOIS

FIGURE 1
FACILITY MAP

PRC ENVIRONMENTAL MANAGEMENT, INC.

CRESCENT.DWG - 08-14-81 - TJM

2.3 REGULATORY STATUS AND HISTORY

The Crescent facility is listed as a RCRA large quantity generator of hazardous waste. In August 1980, Crescent submitted a RCRA Notification of Hazardous Waste Activity as a generator of hazardous wastes, based on its accumulation of wastewater sludge (D003, D007, F006. Note: Crescent incorrectly classifies this waste) (Crescent, 1980). IEPA files contain no records of prior RCRA inspections.

On September 28, 1988, Crescent requested a 30-day extension from IEPA for storing its wastewater sludge (Crescent, 1988a). Crescent had experienced difficulty in finding a landfill to accept this sludge because of U.S. EPA land ban restrictions on listed wastes (Crescent, 1988b). According to IEPA files, approval was granted for the 30-day extension (IEPA, 1988).

3.0 WASTE STREAMS

Crescent currently generates one hazardous waste stream from its plating operations. This waste stream originates from plating solutions that contain acid-based mixtures of zinc, cadmium, nickel, chrome, brass, and copper (D006, F006). Wastewater generated from plating operations flows through drainage trenches to a pump that pumps it to an on-site wastewater treatment unit. The wastewater is pumped into a three-chambered treatment unit, then flows by gravity to a 60,000-gallon settlement tank, where metals are allowed to settle. Treated water is pumped to a clarifier for a final pH adjustment, then discharged to the sanitary sewer system (see Figure 1).

Three times per week, Crescent employees manually pump sludge from the settlement tank into a 2,025-gallon sludge holding tank. They also manually pump the water that separates from the sludge mixture through the treatment process a second time. At least every 90 days, Mr. Frank, Inc. vacuums out the tank and then transports the sludge to a Cyanokem facility in Detroit, Michigan, for treatment.

The waste stream contains other components from plating processes. The first component consists of a lime sulfur solution called EZ-OX that is stored in a 55-gallon drum in the plating area (see Figure 1). The EZ-OX solution is supplied by the Stutz Company in Chicago, Illinois. When the EZ-OX solution becomes saturated with stripping waste, Crescent employees empty the drum into the floor trench drains. The stripping waste combines with the other components of the liquid wastestream and is then pumped to the wastewater treatment unit. Crescent maintains Material Safety Data Sheets (MSDS) for the EZ-OX solution (Stutz, 1991).

A second component of the waste stream includes rinse water that is used to rinse parts during processing. Crescent stores rinse water in two drums, one in the nickel plating area and one in the zinc plating area (see Figure 1). When the water in the drums becomes dirty, Crescent employees empty the fluid into the floor trench drains.

The third component of the waste stream is stripped nickel plating waste from the nickel stripping tank. Crescent employees skim nickel stripping waste off the surface of the nickel stripping solution tank. The employees add the nickel stripping waste to the liquid contents of the floor trench drains.

4.0 INSPECTION FINDINGS

The CEI consisted of an entrance meeting, records review, interviews with facility personnel, and a facility inspection. Significant findings are detailed below.

4.1 RECORDS REVIEW

PRC reviewed manifests, Land Disposal Restriction (LDR) Forms, annual reports, hazardous waste notification forms, a contingency plan, training records, spill control equipment records, and waste analysis results.

Manifests

Crescent maintains manifests on each shipment of hazardous waste. Copies of manifests accompany each shipment and are sent to IEPA. Crescent incorrectly identifies the waste with codes D003, D007, and F006 on the manifests. The correct codes are D006 and F006 (see Waste Analysis Results, below).

LDR Forms

The LDR forms that Crescent uses specify hard and soft hammer waste classifications, which are outdated. The forms also do not include appropriate treatment standards for the wastes generated.

Annual Reports

Crescent completes annual reports as required. PRC photocopied two recent annual reports for use in completing RCRA inspection forms. After reviewing the annual reports, PRC noted that there is a discrepancy between the 1990 Generator Annual Report and the January and October, 1990 manifests, numbers MI 2194796 and MI 1848264. The manifests list the waste generated as D003, D007, and F006, whereas the report identifies the waste as F006.

Hazardous Waste Notification Forms

The Crescent facility originally notified as a generator of hazardous waste in August 1980 (Crescent, 1980). Crescent supplied documentation to PRC that showed an IEPA change of generator identification number in 1984 (IEPA, 1984).

Contingency Plan

PRC inspectors reviewed Crescent's contingency plan. Although the facility does have a plan, there are several deficiencies in its format. Specifically, the contingency plan does not contain the following items:

- The names, addresses, and phone numbers of all personnel qualified to act as emergency coordinators. No alternate emergency coordinator is identified, nor is the existing emergency coordinator listing current.

- Identification and descriptions of emergency equipment, the capabilities of each piece of equipment, and the equipment location. PRC inspectors did note that this information is specified for some, but not all, of the emergency equipment. However, this list is not current.

- An evacuation plan for facility personnel. The facility map also poorly identifies exit routes.

- The actions personnel must take in the case of fires or explosions.

Training Records

Crescent has a training program for employees. The program covers splash and spill control and fire safety procedures. It is missing the following items:

- Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment.
- Communications or alarm systems.
- Directions to implement the contingency plan.
- Names of employees filling hazardous waste management positions, along with a written job description that includes skill levels needed for these positions. No written description of the type and amount of training these employees receive is provided.

Waste Analysis Results

Toxicity Characteristic Leaching Potential (TCLP) analyses were run on samples of the wastewater treatment sludge to determine whether or not the sludge was hazardous, as per 40 CFR Part 261, Subpart C. The testing included analyses for leachable metals and organics. Analyses were conducted by Scientific Control Laboratories, Inc. (Scientific) in October 1990. Scientific determined that the sludge was a hazardous waste. In addition to the F006 waste code for the Crescent sludge, Scientific identified the waste code D006 for cadmium (Scientific, 1990).

The treated water that is discharged to the sanitary sewer systems is also routinely sampled to ensure compliance with the standards of the Water Reclamation District of Greater Chicago (WRDGC) for metals in electroplating effluent. The most recent testing was conducted by Industrial Environmental Compliance, Inc. (IEC). IEC analyzed three composite water samples in March 1991, following test methods required under 40 CFR 136 (IEC, 1991). Crescent submitted sample analyses results to WRDGC in a Continued Compliance Report in March 1991 (Crescent, 1991b).

Spill Control Equipment Records

In the event of a spill or leak of raw acid or plating solutions, Crescent stores CHEMSORB pillows and disposal bags on-site. The pillows are supplied to Crescent by Precision Laboratories, Inc. (Precision) in Northbrook, Illinois. The pillows are designed to meet RCRA requirements. Crescent maintains MSDS sheets for the CHEMSORB pillows (Precision, 1987). To date, there have been no spills or leaks at the Crescent facility. Crescent informed PRC that in the event of a spill or leak, arrangements have been made with Mr. Frank, Inc. to transport the used CHEMSORB pillows to the Cyanokem landfill in Detroit, Michigan. The appropriate manifest would be completed (Crescent, 1991c).

Summary of Recordkeeping Deficiencies

The Crescent facility has the following deficiencies in its recordkeeping:

- Use of inappropriate LDR forms.
- Identifying the waste stream only as F006 in the 1990 Annual Report, and listing it incorrectly as D003, D007, F006 on the January and October, 1990 manifests.
- The contingency plan is missing several components.
- The employee training program is inadequate.

4.2 FACILITY INSPECTION

PRC inspected the shipping/receiving area, plating and packaging areas, and the wastewater treatment plant at the Crescent facility.

PRC began the inspection in the shipping/receiving area. Raw materials are delivered to the shipping dock. Acid used in plating solution is stored on racks along the south wall of the Lawndale Building (see Figure 1). The Lawndale Building is used to house plated items, a washroom, and a locker room.

Plating operations and packaging are conducted in the east wing of the Crescent facility building (see Figure 1). The first nickel plating area consists of one rinse tank and four dip tanks. In the nickel plating area, PRC noted two unmarked drums containing waste fluid. The

first drum was a 55-gallon drum, which was improperly covered with a makeshift lid made from a square sheet of metal. The second drum was an open 30-gallon drum. Both drums were more than half full of waste fluid. Crescent informed PRC inspectors that the drums are used for plating processes. The 55-gallon drum is used to finish copper plated with EZ-OX. The 30-gallon drum contains rinse water. PRC photographed both drums (see Photo 1 and Photo 2). Just beyond the 30-gallon drum, the facility houses two additional rinse tanks and one nickel stripping tank, which is used to strip nickel plating mistakes (see Figure 1).

A floor trench runs the length of the nickel plating area. Floor trenches throughout the facility are used to trap waste fluid. Wastewater from the floor trenches flows to two pumps at the east end of the nickel plating area, where it is automatically pumped to the wastewater treatment unit (see Figure 1). Throughout the facility, floor trenches are covered with wooden ramps, or walkways. PRC inspectors noted that these walkways were often saturated with waste liquids, and in some cases they were decaying. Photo 3 shows a typical segment of the wooden walkways. This particular segment shows where the floor trench that runs along the nickel plating area runs into the pumping area, where wastewater is pumped to the pollution control area (see Photo 3). PRC noted that no hazard signs were posted in this area.

The zinc plating area runs along the east wall of the facility, and consists of eight plating tanks, two cleaning tanks, and one rinse tank. A large overhead oven, used occasionally for drying specialty items, runs from the rinse tank to the first plating tank (see Figure 1). A floor trench runs the length of the zinc plating area. PRC noted a third open drum containing rinse water. This drum is a 55-gallon drum that has had the top portion cut off (see Figure 1). In this area, portions of the wooden walkway are rotted away. In some locations, the trench is completely uncovered. A photo was taken of the open trench, but the photo was damaged during processing. No hazard signs were posted in this area.

A packaging area is located directly across from the zinc plating area. A telephone is housed in a central location in the packaging area. Crescent considers the telephone to be its communications system for employees in the case of an emergency. PRC noted that no emergency telephone numbers were posted nearby. PRC also noted that the concrete floor was wet, possibly with acid solution, in several portions of the packaging area that were adjacent to the acid plating tanks and the wastewater floor trenches (see Photo 4).

At the end of the packaging area, across from the first nickel plating area, a dumpster is used to accumulate packaging waste (see Figure 1). PRC noted that the absorbent material (powdered corn cob) that Crescent uses to dry wet areas of the floor was placed in the dumpster. It is possible that the absorbent material could be contaminated with hazardous waste material if

it is used to absorb spilled acid solution. This material may require a TCLP analysis to ensure that it is nonhazardous. Currently, Crescent does not run TCLP analyses on the absorbent material. Crescent contracts with Browning-Ferris, Inc. (BFI) to empty the contents of this dumpster. Crescent personnel did not know to which landfill the material is transported.

The third plating area inspected was the zinc/cadmium plating area. The entire plating area is housed on a raised platform about five feet high. This area contains chrome, nickel, zinc, and cadmium plating tanks (see Figure 1). A separate tank is housed at the north end of the platform. It is used for military "olive" colored plating (see Figure 1).

The last area inspected was the pollution control area. All wastewater is pumped to a three-chambered treatment unit in this area. In the first chamber, the pH is adjusted with caustic soda. The second chamber is used for cyanide destruction, which is generated during the zinc plating process. The third chamber is a flocculation chamber (see Figure 1). The wastewater flows by gravity into a 60,000-gallon settling tank. The wastewater stays in this tank for four or five hours, which allows metals to settle out. The solution is aerated by mixing it while it is in the settling tank. The treated water is then pumped to a clarifier for a final pH adjustment with muriatic acid. The treated water stays in the clarifier for 4 or 5 minutes and is continuously discharged to the sanitary sewer system, at an average rate of 103,463 gallons per day (Crescent, 1991b). Photo 5 shows the wastewater treatment unit, with the settling tank in the background (see Figure 1 and Photo 5).

Three times per week, Crescent employees manually pump sludge from the settling tank to a 2025-gallon sludge holding tank (see Figure 1 and Photo 6). Employees also pump water that separates from the sludge to the wastewater treatment unit, where it undergoes a second treatment. At least every 90 days, Mr. Frank, Inc. vacuums the sludge out of the holding tank and transports it to the Cyanokem landfill in Detroit, Michigan. PRC noted that the sludge holding tank was not labeled with the words "Hazardous Waste".

During the CEI, PRC inspectors made several observations of Crescent practices that are not RCRA violations, but might be considered worker safety deficiencies. Specifically, workers involved in plating operations did not wear safety glasses or respirators. In the packaging area, the floor was wet, possibly with acid. One packaging worker was wearing shorts and open sandals. In addition, although the majority of the facility's personnel speak Spanish, the signs posted were only in English. PRC inspectors also noted several empty product drums that were stored unused throughout the facility. One drum contained zinc cyanide at one time. It is possible that residue from these drums could pose a hazard to workers.

it is used to absorb spilled acid solution. This material may require a TCLP analysis to ensure that it is nonhazardous. Currently, Crescent does not run TCLP analyses on the absorbent material. Crescent contracts with Browning-Ferris, Inc. (BFI) to empty the contents of this dumpster. Crescent personnel did not know to which landfill the material is transported. It is possible that this material may be an Illinois Special Waste regulated under 35 IAC 807 through 809.

The third plating area inspected was the zinc/cadmium plating area. The entire plating area is housed on a raised platform about five feet high. This area contains chrome, nickel, zinc, and cadmium plating tanks (see Figure 1). A separate tank is housed at the north end of the platform. It is used for military "olive" colored plating (see Figure 1).

The last area inspected was the pollution control area. All wastewater is pumped to a three-chambered treatment unit in this area. In the first chamber, the pH is adjusted with caustic soda. The second chamber is used for cyanide destruction, which is generated during the zinc plating process. The third chamber is a flocculation chamber (see Figure 1). The wastewater flows by gravity into a 60,000-gallon settling tank. The wastewater stays in this tank for four or five hours, which allows metals to settle out. The solution is aerated by mixing it while it is in the settling tank. The treated water is then pumped to a clarifier for a final pH adjustment with muriatic acid. The treated water stays in the clarifier for 4 or 5 minutes and is continuously discharged to the sanitary sewer system, at an average rate of 103,463 gallons per day (Crescent, 1991b). Photo 5 shows the wastewater treatment unit, with the settling tank in the background (see Figure 1 and Photo 5).

Three times per week, Crescent employees manually pump sludge from the settling tank to a 2025-gallon sludge holding tank (see Figure 1 and Photo 6). Employees also pump water that separates from the sludge to the wastewater treatment unit, where it undergoes a second treatment. At least every 90 days, Mr. Frank, Inc. vacuums the sludge out of the holding tank and transports it to the Cyanokem landfill in Detroit, Michigan. PRC noted that the sludge holding tank was not labeled with the words "Hazardous Waste". PRC also clarified that the sludge holding tank is not part of the pretreatment system. The pretreatment system consists of the three-chambered treatment unit and the settling tank, which are not subject to regulation under RCRA.

During the CEI, PRC inspectors made several observations of Crescent practices that are not RCRA violations, but might be considered worker safety deficiencies. Specifically, workers involved in plating operations did not wear safety glasses or respirators. In the packaging area, the floor was wet, possibly with acid. One packaging worker was wearing shorts and open

5.0 INSPECTION SUMMARY AND REGULATORY DETERMINATIONS

The Crescent facility in Chicago, Illinois is a large-quantity generator of hazardous wastes. PRC inspected the facility on June 13, 1991 as a generator of hazardous waste, subject to applicable portions of IAC Title 35 and 40 CFR Part 268. PRC noted the following violations of IAC and 40 CFR:

IAC Violations:

- The facility has not complied with all IAC regulations for waste in tanks [35 IAC 722.134(a)(1)].
  - No certified, written assessment is available for a sludge storage tank that does not have secondary containment (35 IAC 725.291).
  - No spill and overfill prevention controls are provided for the sludge storage tank. Sufficient freeboard also is not provided for this open tank (35 IAC 725.294).
  - The facility does not conduct inspections of the sludge storage tank (35 IAC 725.295).
- The sludge storage tank is not labeled with the words "Hazardous Waste" [35 IAC 722.134(a)(3)].
- The facility has not complied with IAC regulations for its contingency plan and training program [35 IAC 722.134(a)(4)].
  - The facility's training program does not include procedures for using and repairing emergency and monitoring equipment; maintaining communications or alarm systems; and implementing the contingency plan. The plan also does not specify the names and job titles of employees managing hazardous wastes, nor does it include written job descriptions and amounts of training necessary for these positions (35 IAC 725.116).
  - The contingency plan does not describe a course of action for facility personnel to follow in the case of fires or explosions. The plan does not

sandals. In addition, although the majority of the facility's personnel speak Spanish, the signs posted were only in English. PRC inspectors also noted several empty product drums that were stored unused throughout the facility. One drum contained zinc cyanide at one time. It is possible that residue from these drums could pose a hazard to workers. In fact, if the containers have not been "triple rinsed" to remove the residue the containers themselves are hazardous waste (P121).

5.0 INSPECTION SUMMARY AND REGULATORY DETERMINATIONS

The Crescent facility in Chicago, Illinois is a large-quantity generator of hazardous wastes. PRC inspected the facility on June 13, 1991 as a generator of hazardous waste, subject to applicable portions of 35 IAC. Specific violations of 35 IAC are listed below:

1). **722.134(a).** The facility has not complied with all 35 IAC regulations for waste in tanks. Specifically, the sludge storage tank is not labelled with the words "Hazardous Waste". The facility also has deficiencies in its employee training program and contingency plan. The facility did not comply with the following requirements:

- **(725.116(a))**. The facility's training program does not include procedures for using and repairing emergency and monitoring equipment; maintaining communications or alarm systems; and implementing the contingency plan.

- **(725.116(d))**. The facility's training program does not specify the names and job titles of employees managing hazardous wastes, nor does it include written job descriptions and amounts of training necessary for these positions.

- **(725.152(a))**. The contingency plan does not describe a course of action for facility personnel to follow in the case of fires or explosions.

- **(725.152(d))**. The contingency plan plan does not provide adequate information about emergency coordinators.

provide adequate information about emergency coordinators, emergency equipment, or evacuation routes and procedures (35 IAC 725.152).

LDR Violations:

- The facility does not use the correct LDR forms. The forms used specify soft and hard hammer waste classifications, which are outdated. The forms do not include appropriate treatment standards for the wastes generated [40 CFR 268.7(a)(1)(ii)].

- The facility incorrectly classifies its hazardous waste with the codes D003, D007, and F006. The correct codes are D006 and F006 [40 CFR 268.9(a)].

- **(725.152(e))**. The contingency plan does not provide adequate information about emergency equipment.

- **(725.152(f))**. The contingency plan does not include an adequate evacuation plan.

- **(725.291)**. No certified, written assessment is available for a sludge storage tank that does not have secondary containment.

- **(725.294)**. No spill and overfill prevention controls are provided for the sludge storage tank.

- **(725.295(a))**. The facility does not conduct inspections of the sludge storage tank.

2). **728.107(a)**. The facility does not make the correct land disposal restriction determination (LDR forms are outdated and do not include appropriate treatment standards for the wastes generated).

3). **728.109(a)**. The facility incorrectly classifies its hazardous waste with the codes D003, D007, and F006. The correct codes are D006 and F006.

REFERENCES

Crescent, 1980, Notification of Hazardous Waste Activity Form (August 12, 1980).

Crescent, 1988a, Letter from Crescent to IEPA requesting a thirty-day extension for sludge disposal (September 28, 1988).

Crescent, 1988b, Letter from Crescent to IEPA describing difficulties in finding a facility to accept waste sludge (September 23, 1988).

Crescent, 1991a, telephone interview between Eileen Porps, Crescent, and Laurel Berman, PRC, regarding the facility history at its current site (June 19, 1991).

Crescent, 1991b, Continued Compliance Report submitted by Crescent to Water Reclamation District of Greater Chicago regarding analysis of treated wastewater (March 27, 1991).

Crescent, 1991c, telephone interview between Eileen Porps, Crescent, and Laurel Berman, PRC, regarding potential use of CHEMSORB pillows (June 21, 1991).

IEC, 1991, Analysis results of three composite samples of Crescent's treated wastewater (March, 1991).

IEPA, 1984, IEPA letter to Crescent regarding a change in the generator identification number, (August 1, 1984).

IEPA, 1988, File memo regarding granting of extension to Crescent for sludge disposal (October 3, 1988).

Precision, 1987, Material Safety Data Sheets for CHEMSORB pillows stored by Crescent for spill control (August 6, 1987).

Scientific, 1990, TCLP waste analyses of two samples of Crescent's wastewater treatment sludge (October 23, 1990).

Stutz, 1991, Material Safety Data Sheet for Lime-Sulfur Solution used by Crescent for metal stripping (June, 1991).

RCRA Inspection Report

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL 2 5 0 5 0 2 0 2 1 IEPA #: 0 3 1 6 0 0 0 0 6 3

Facility Name: Crescent Plating Works, Inc Phone #: 312 772-0110

Street Address: 3650 N. Armitage Ave County: Cook

City: Chicago State: IL Zip: 60647

Region: Maywood Inspection Date: 6/13/91 From: 10:00 AM To: 2:00 PM

Weather: Sunny ~80° F

TYPE OF FACILITY

Notified As: Large-quantity Generator (LQG) Regulated As: LQG

TDF? ---- TPV? 90-Day F/U Required?: YES ✓ NO ____

TYPE OF INSPECTION

CEI: ✓ Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____

CME/C&M: ____ Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS

SQG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

PART A

Notification Date: 8/12/80, from (initial) or (subsequent) Notification.

Initial Part A Date: ___/___/___ Amended: ___/___/___

Part A Withdrawal requested: ___/___/___ Approved by (US)(IL) EPA: ___/___/___

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) ___/___/___ Final Permit Issued: ___/___/___

ENFORCEMENT

Has the firm been referred to – USEPA: Y or (N) ___/___/___

Illinois Attorney General: Y or (N) ___/___/___ County State's Attorney: Y or (N) ___/___/___

ORDERS ISSUED

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

Federal Court Order: ___/___/___ State Court Order: ___/___/___ IPCB Order: ___/___/___

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report 19	19	19

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D 0 0 5 0 a 7 6 2 1 IEPA #: 0 3 1 6 0 0 0 0 6 3

Facility Name: Crescent Platina Works, Inc Phone #: 312/772-0110

Street Address: 3650 W. Armitage Ave County: Cook

City: Chicago State: IL Zip: 60647

Region: Maywood Inspection Date: 6/13/91 From: 10:00AM To: 2:00 PM

Weather: Sunny, ~80° F

TYPE OF FACILITY

Notified As: Large-quantity Generator (LQG) Regulated As: G

LDF? HPV? 90-Day F/U Required?: YES ✓ NO

TYPE OF INSPECTION

CEI: ✓ Sampling: Citizen Complaint: Closed: Other:

CME/O&M: Record Review: Follow-Up to Inspection of: Withdrawal:

NON-REGULATED STATUS

SQG: Claimed Nonhandler: Other (Specify in Narrative):

PART A

Notification Date: 8/12/80, from (Initial) or (subsequent) Notification.

Initial Part A Date: / / Amended: / /

Part A Withdrawal requested: / / Approved by (US)(IL) EPA: / /

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) / / Final Permit Issued: / /

ENFORCEMENT

Has the firm been referred to – USEPA: Y or (N) / /

Illinois Attorney General: Y or (N) / / County State's Attorney: Y or (N) / /

ORDERS ISSUED

CACO: / / CAFO: / / Consent Decree: / /

Federal Court Order: / / State Court Order: / / IPCB Order: / /

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Recon 19	19	19

I-1834

OWNER		OPERATOR	
Name	Donald Saporite	Name	Crescent Plating Works, Inc.
Address	3650 N Armitage	Address	
City	Chicago	City	Salem
State	IL Zip [illegible]	State	Zip
Phone #	312/772-0100	Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
Eileen Porps	Crescent / Office Mgr.	312/772-0100
Leslie Williams	Crescent / Poll. Treatment Oper.	"

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Eileen Porps	above	above
Leslie Williams	above	above
John Grabs	PRC / Lead Inspector	312/858-8200
Laurel Berman	PRC / Inspector	"

PREPARED BY	AGENCY/TITLE	PHONE #
Laurel Berman	PRC Inspector	312/858-8700

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
OTH	I	35 IAC 722.134 (a)(1)
		(725 291)
		(725 294)
		(725 295)
OTH	I	722.134 (a)(3)
OTH	I	722.134(a)(4)
		(725 116)
		(725.152)

Area	Class	Section

Area	Class	Section

OWNER		OPERATOR	
Name	Donald Saporito	Name	Crescent Plating Works, Inc.
Address	3650 W. Armitage Ave.	Address	
City	Chicago	City	
State	IL Zip 60647	State	Zip
Phone #	312/772-0110	Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
Eileen Porps	Crescent / Office Mgr.	312/772-0110
Leslie Williams	Crescent / Poll. Treatment oper.	"

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Eileen Porps	above	above
Leslie Williams	above	above
John Grabs	PRC/ Lead Inspector	312/886-8700
Laurel Berman	PRC /Inspector	"

PREPARED BY	AGENCY/TITLE	PHONE #
Laurel Berman	PRC /Inspector	312/886-8700

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
OTH	1	722.134(a)
		(725.116(a))
		(725.116(d))
		(725.152(a))
		(725.152(d))
		(725.152(e))
		(725.152(f))
		(725.291(a))
		(725.294)
		(725.295(c))
OTH	1	728.107(a)
OTH	1	728.109(a)

Area	Class	Section

Area	Class	Section

Facility Name: [illegible]

USEPA # D 0 0 5 0 9 7 6 2 1

IEPA # 0 3 1 6 0 0 0 0 6 3

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12	On 3510-3	On Annual Report for: 19 85 (Circle if present; cross out if not present)	19 90	19	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Wastewater sludge (from electroplating)	Wastewater treatment of sludge	10/23/90	(D008) F006			G F	G F	G F	20K gal on Holding Tank	≤ 2000 gals/ 90 days	4/29/91	Mr Frank, Inc. transports to Cyanokem, landfill in Detroit, MI.

* All "NO" responses must be explained in narrative.

Preinspection File Review Form

PRE-INSPECTION FILE REVIEW FORM

Facility Name: CRESCENT PLATING WORKS, INC.

Location: 3650 W. ARMITAGE AVE. CHICAGO, IL 60647

ID#: ILD005057621 (USEPA) 031600063 (IEPA)

Activity: ELECTROPLATING OPERATION

Last Inspection if applicable: N/A

Past Violations: NO PRIOR INSPECTIONS (N/A)

Large-Quantity Generator Checklist

Area	Class	90 Day Fac Req	Key Ltr / Sub Set	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	✓			
			a	Has the generator obtained a USEPA identification number? Yes ✓ No ___				
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ___				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart B: The Manifest**				
MAN	2			**Section 722.120: General Requirements**	✓			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No ___ **Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.**				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ___ **Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.**				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ___ No ___ N/A ✓				No such instances — When cannot deliver, it is arranged prior to transport to find a new facility

IL 532-1502
LPC 256 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Corrective Action
MAN	2			**Section 722.121: Acquisition of Manifests**	✓			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✓ No ___ N/A ___				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✓ No ___ N/A ___				
MAN	2			**Section 722.122: Number of Copies**	✓			
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2			**Section 722.123: Use of the Manifest**	✓			
				For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✓ No ___ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ___				

IL 532-1892
LPC 256 8787

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ✓ No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ___				
				NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ___				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ___ No ___ N/A ✓				No. bulk shipments
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ___ No ___ N/A ✓				No rail shipments

IL 532-1502
(Rev. 25A 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks and Comments for
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				
OTH	1	X		**Section 722.130: Packaging** Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	No packaging, labeling, or marking performed (all handled by transporter
OTH	1	X		**Section 722.131: Labeling** Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		**Section 722.132: Marking**			✓	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ___ No ___				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ___ No ___ - The manifest document number associated with the container? Yes ___ No ___ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ___ No ___				

IL 532-1882

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**Section 722.133: Placarding** Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? **NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.**			✓	Placards supplied by transporter
OTH	1	X		**Section 722.134: Accumulation Time** ***NOTE:* If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.** **NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.**		✓		
			a	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: **NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.**				

IL 532-1502
IPC 254 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
0111	1	X		**Section 722.134: Accumulation Time**		✓		
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I? **and/or** For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ___ No ✓				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ___ No ___ N/A ✓				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ___ No ✓				Some, but not all in compliance
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes ___ No ✓				

IL 532-1502
LPC 25a 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				Condition of Containers (Section 725.271) Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ___ No ___ N/A ✓ **Compatibility of Waste with Container (Section 725.272)** Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes ✓ No ___ **Management of Containers (Section 725.273)** Are containers of hazardous waste always closed during storage? Yes ___ No ___ N/A ✓ Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ___ No ___ N/A ✓ **Inspections (Section 725.274)** Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ___ No ___ N/A ✓ **NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.**				No leaking containers No containers of H.W. There is process waste (rinsewater) in drums, but no sludge stored anywhere except storage tank.

IL 532-1502
LPC 256 8/87

Area	Class	30 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				Special Requirements for Ignitable or Reactive Wastes (Section 725.275) Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes ___ No ___ N/A ✓ **Special Requirements for Incompatible Wastes (Section 725.277)** Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___ N/A ✓				No reactive wastes No ignitable wastes (in sludge) No incompatible wastes

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below: **NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.** **NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.** **Assessment of Existing Tank Systems (Section 725.291)** For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No ✓ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.** Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ✓				No written assessment or secondary containment

IL 532-1502
LPC 288 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comments Re:
				Design and Installation of New Tank Systems or Components (Section 725.292)				
				Is secondary containment provided for any new tank system (constructed after July 14, 1986) before being put into service? Yes ___ No ___ N/A ✓				Tank is dated from 1979
				For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ___ No ___ N/A ✓				
				Does the assessment include, at a minimum, the following:				
				1) design standard for tanks and ancillary equipment;				
				NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.				
				2) hazardous characteristics of the waste; and				
				3) evaluation of potential for corrosion and corrosion protection measures? Yes ___ No ___				
				Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ___ No ___ N/A ✓				Not a new tank system (from 1979)
				Containment and Detection of Releases (Section 725.293)				
				Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ___ No ___ N/A ✓				These wastes are not stored

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes ___ No ___ N/A ✓				Tank is 12 years old ∴ does not need secondary containment
				For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ___ No ___ N/A ✓				
				or				
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes ___ No ___ N/A ✓				
				For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes ___ No ___ N/A ✓				Waste haz. before 1/12/87
				Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes ___ No ___ N/A ✓				No secondary containment
				NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).				
				Are spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes ___ No ___ N/A ✓				No spills

IL 532-1502
LPC 250 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.				
				Does the secondary containment have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes ___ No ___ N/A ✓				No secondary (U") containment
				NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.				
				Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for: 1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes ___ No ✓ N/A ___				No U" containment
				Until such time as secondary containment is provided, are the following requirements being met for all tank systems:				

IL 532-1502
LPC 250 0787

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ___ No ___ N/A ___				No underground tanks
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ___ No ___ N/A ✓				
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ___ No ___ N/A ✓				
				General Operating Requirements (Section 725.294)				
				Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ___ No ✓				
				Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ___ No ✓ N/A ___				* should be no waves/ wind - Tank is inside, yet open to air
				If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ___ No ___ N/A ✓				No leaks/spills

IL 532-1502
LPC 258 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ___ No ___ N/A ✓				No underground tanks
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ___ No ___ N/A ✓				
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ___ No ___ N/A ✓				
				General Operating Requirements (Section 725.294)				
				Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ___ No ✓				
				Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ___ No ___ N/A ✓				— should be no wave/wind action because tank is inside, but open to some outside air (vents to outside
				If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ___ No ___ N/A ✓				No leaks/spills

IL 532-1502
LPC 258 0787

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				Inspections (Section 725.295) Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes ____ No ✓ **Response to Leaks or Spills and Disposition of Tank Systems (Section 725.296)** Does the facility have a tank system or secondary containment system from which there has been a leak or *spill, or which is unfit for use?* Yes ____ No ✓ **NOTE: If "No", skip to Closure and Post Closure Care (Section 725.297). If "Yes", answer the following questions.** If a tank or secondary containment system has leaked, has the owner done the following: 1) Ceased using, stopped inflow of wastes? Yes ____ No ____ 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____ 3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____				No operating record, no tank inspections written down

IL 532-1592
LPC 256 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No

4) Reported to the Agency within 24 hours of detection?
Yes ___ No ___

NOTE: Reporting to the Agency is not necessary if less than one pound of material which was immediately contained and cleaned up was spilled.

5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)?
Yes ___ No ___

If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service?
Yes ___ No ___ N/A ___

NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.

Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?
Yes ___ No ___ N/A ___

Has the certification been submitted within 7 days after returning the tank system to use?
Yes ___ No ___ N/A ___

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				Closure and Post Closure Care (Section 725.297) **NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Special Requirements for Ignitable or Reactive Wastes (Section 725.298).** At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes ____ No ____ Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes ____ No ____ If contaminated soils are not removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes ____ No ____ **NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.** **Special Requirements for Ignitable or Reactive Wastes (Section 725.298)** Are ignitable or reactive wastes stored in tanks? Yes ____ No ✓ **NOTE: If "No", skip to Special Requirements for Incompatible Wastes (Section 725.299).**				No closure applicable

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ___ No ___ **NOTE: Tank systems used solely for emergencies may store ignitable/reactive wastes.** Are there proper protective distances between the waste management area and the facility boundary line? Yes ___ No ___ **Special Requirements for Incompatible Wastes (Section 725.299)** Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ___ No ___ N/A ✓				No incompatible wastes.

IL 532-1802
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
			a2	**For waste in containers,** has the generator marked and made visisble for inspection on each container, the date upon which accumulation began? Yes ___ No ___ N/A ✓				No container storage
			a3	**For waste in containers and tanks,** has the generator marked or labeled each with the words "Hazardous Waste"? Yes ___ No ✓				Tank not labeled w/the words "Haz. Waste"
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below: **Maintenance and Operation of Facility (Section 725.131)** Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air; - Soil; or - Surface Water, which would threaten human health or the environment? Yes ✓ No ___				

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No

Required Equipment (Section 725.132)

Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:

- An internal communications or alarm system capable of providing immediate emergency instructions?
  Yes ✓ No ___ N/A ___

- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams?
  Yes ✓ No ___ N/A ___

- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?
  Yes ✓ No ___ N/A ___

- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems?
  Yes ✓ No ___ N/A ___

NOTE: Any "N/A" answers must be explained in the Remarks column.

IL 532-1592
LPC 286 8/87

Area	Class	90 Day F'U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				Testing and Maintenance of Equipment (Section 725.133) Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: - Communications/alarm systems? Yes ✓ No ___ N/A ___ - Fire protection equipment? Yes ✓ No ___ N/A ___ - Spill control equipment? Yes ✓ No ___ N/A ___ - Decontamination equipment? Yes ✓ No ___ N/A ___ **NOTE: Any "N/A" answer must be explained in the Comments.** **Access to Communications or Alarm Systems (Section 725.134)** Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 735.132? Yes ✓ No ___ N/A ___ If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes ✓ No ___ N/A ___				

IL 532-1582
LPC 256 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No

Required Aisle Space (Section 725.135)

Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?

Yes ✓ No ___ N/A ___

NOTE: Document non-compliance with photograph.

Arrangements with Local Authorities (Section 725.137)

Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at this facility and the potential need for the services of these organizations:

1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes?
Yes ✓ No ___ N/A ___

2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority?
Yes ✓ No ___ N/A ___

IL 532-1592
LPC 288 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ✓ No ___ NA ___				
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No ___ N/A ___				
				NOTE: Any "N/A" answer must be explained in the Comments.				
				Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ___ No ___ N/A ✓				never refused entry
				Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart D: Contingency Plan and Emergency Procedures listed below:				
				Purpose and Implementation of Contingency Plan (Section 725.151)				
				Is a plan available? Yes ✓ No ___				* plan is missing several components (b/c law)
				NOTE: If answer is "No", skip to Emergency Coordinator (Section 725.155).				

IL 532-1502
LPC 258 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No				
				Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes No N/A ✓				
				Content of Contingency Plan (Section 725.152)				
				Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:				
				1) Fires? Yes No ✓				E spills only
				2) Explosions? Yes No ✓				
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No				
				Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes ✓ No				
				2) Hospitals? Yes ✓ No				
				3) Contractors? Yes No N/A ✓				NO contract NS
				4) State and local emergency response teams? Yes ✓ No				

IL 532-1802
LPC 256 0787

Area	Class	90 Day F'U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes ___ No ✓ Is the list of emergency coordinators up-to-date? Yes ___ No ✓ If more than one person is designated as an emergency coordinator, is a primary coordinator identifed? Yes ___ No ✓ Does the plan identify: 1) A list and physical description of all emergency equipment at the facility? Yes ___ No ✓ 2) A brief outline of the capability of each piece of emergency equipment? Yes ___ No ✓ 3) The location of each piece of emergency equipment? Yes ___ No ✓ Is the list of emergency equipment up-to-date? Yes ___ No ✓ Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ___ No ✓ N/A ___				-Only one person designated * A rough facility map very poorly outlines evacuation exit routes, but does not identify them as ~~routes~~ routes

IL 532-1502
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				Does the plan identify the signal to be used to begin evacuation? Yes ___ No ✓				
				Are alternate evacuation routes identifed? Yes ✓ No ___				* poorly done (see comments)
				Copies of Contingency Plan (Section 725.153)				
				Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes ✓ No ___				
				b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ✓ No ___				
				Amendment of Contingency Plan (Section 725.154)				
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
				1) Applicable regulations are revised? Yes ___ No ___ N/A ✓				No revisions
				2) The plan fails in an emergency? Yes ___ No ___ N/A ✓				No emergency to date

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes in the response necessary in an emergency? Yes ___ No ___ N/A ✓ 4) The list of emergency coordinators changes? Yes ___ No ___ N/A ✓ 5) The list of emergency equipment changes? Yes ___ No ___ N/A ✓ **Emergency Coordinator (Section 725.155)** Is there an emergency coordinator on-site or on call at all times? Yes ✓ No ___ Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes ✓ No ___ Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes ✓ No ___				No changes

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Emergency Procedures (Section 725.156)				
				Has the facility had a release, fire or explosion? Yes ___ No ✓				
				NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column of 722.134.				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725.116: Personnel Training listed below:				
				Personnel Training (Section 725.116)				
				Does the facility have a training program? Yes ✓ No ___				
				NOTE: If "No", skip to Subsection (c)1 page GEN-C-26.				
				Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ✓ No ___				
				Is the training program formalized, i.e., written down? Yes ✓ No ___				
				Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ✓ No ___				

IL 532-1592
LPC 256 8787

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				Does the program cover, at a minimum: 1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ___ No ✓ N/A ___ 2) Key parameters for automatic waste feed cut-off systems? Yes ___ No ___ N/A ✓ 3) Communications or alarm systems? Yes ___ No ✓ 4) Response to fire or explosion? Yes ✓ No ___ 5) Response to groundwater contamination incidents? Yes ___ No ___ N/A ✓ Does the program cover the implementation of the contingency plan? Yes ___ No ✓ Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No ___ N/A ___ Has the facility conducted an annual review of the initial training? Yes ✓ No ___ N/A ___				No auto waste feed cut-off systems No GW contamination incidents BUT: note condition of concrete floor in narrative – wet w/acids

IL 532-1602
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				Does the program cover, at a minimum: 1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ___ No ✓ N/A ___ 2) Key parameters for automatic waste feed cut-off systems? Yes ___ No ___ N/A ✓ 3) Communications or alarm systems? Yes ___ No ✓ 4) Response to fire or explosion? Yes ✓ No ___ 5) Response to groundwater contamination incidents? Yes ___ No ___ N/A ✓ Does the program cover the implementation of the contingency plan? Yes ___ No ✓ Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No ___ N/A ___ Has the facility conducted an annual review of the initial training? Yes ✓ No ___ N/A ___				No auto waste feed cut-off systems Note: In training, but not in contingency plan No GW contamination incidents BUT: note condition of concrete floor in narrative - wet w/ acids.

IL 532-1502
LPC 286 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				Are the following documents and records being maintained at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ___ No ✓ 2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ___ No ✓ 3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ___ No ✓ 4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ✓ No ___ Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ✓ No ___ N/A ___				Note: not dated

IL 532-1392
LPC 256 6/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				Are the following documents and records being maintained at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ___ No ✓ 2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ___ No ✓ 3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ___ No ✓ 4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ✓ No ___ Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ✓ No ___ N/A ___				The training program is written as far as identifying routes, fire procedures, for example BUT no written description of type and amount of training is provided, or job descriptions for persons dealing w/haz. waste ← Note: not dated

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				SATELLITE ACCUMULATION				
			c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:				No satellite accumulation
				- Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ____ No ____ N/A ✓				
				- Complying with the requirements of:				
				1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ____ No ____				
				2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ____ No ____				
				3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ____ No ____				
				- Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ____ No ____				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
			c2	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ___ No ___ Are the containers with the excess amounts marked with the date accumulation began? Yes ___ No ___ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ___ No ___				

IL 532-1892
LPC 288 8787

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting**				
OTH	2			**Section 722.140: Recordkeeping**	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ___				
			b	- A copy of each annual report? Yes ✓ No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A ✓				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ___ N/A ___				No exception reports necessary
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ___ No ___ N/A ✓				No unresolved enforcement action
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ___ No ___ N/A ✓				No requests

IL 532-1502
LPC 250 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
OTH	2			**Section 722.141: Annual Reporting** Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? **NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.**	✓			
MAN	1			**Section 722.142: Exception Reporting**			✓	No case occured for Exception Reports
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____				
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____				
			b	Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and				

IL 532-1502
LPC 258 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____				
OTH	1			**Section 722.143: Additional Reporting** Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?			✓	None needed

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1/2			**PART 722** **GENERATOR STANDARDS** **Subpart E: Exports of Hazardous Waste**			✓	No exports

Section 722.152: General Requirements

Has the facility made any shipments of hazardous waste outside the United States?
Yes ___ No ___

NOTE: If "No", skip Subpart E. If "Yes", answer the next question.

Has the generator complied with the requirements in Sections 722.152 through 722.157?
Yes ___ No ___

NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.

IL 532-1882
LPC 286 0787

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste**				
MAN	1			**Section 722.160: Imports of Hazardous Waste**			✓	No imports
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used;				
				and				
			b2	Has the importer or his agent signed the manifest in place of the generator;				
				and				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

IL 532-1502
LPC 258 0787

Area	(	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart G: Farmers**				
OTH	2	X		**Section 722.170: Farmers** Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ___ **NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).**			✓	No farming / pesticide use

IL 532-1882
LPC: 258 8/87

RCRA Land Disposal Restriction Checklist

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Crescent Plating Works, Inc

U.S. EPA ID No.: ILD005097621

Street: 3650 W. Armitage Ave.

City: Chicago State: IL Zip: 60647

Telephone: 312/772-0110

Inspection Date: 6/13/91 Time: 10:00 (am/pm)

Weather Conditions: Sunny 80°F

	Name	Agency/Title	Telephone
Inspectors:	John Grahs	PRC/Lead Inspector	312/856-8700
	Laurel Berman	PRC/Inspector	"
Facility Representatives:	Eileen Pops	Crescent/Office Mgr	312/772-0110
	Leslie Williams	Crescent/Poll. Trtmt operator	"

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	____	____	____	____	____
F020-F023 and F026-F028	____	____	____	____	____
California List*	____	____	____	____	____
First Third [40 CFR 268.10]	✓	____	____	____	____
Second Third [40 CFR 268.11]	____	____	____	____	____
Third Third [40 CFR 268.12]	✓	____	____	____	____

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Electroplating of steel and brass items with:
Zinc, cadmium, nickel, chrome, brass, copper

LDR Waste Management:

Plating wastewater runs through floor trenches to sump pump, where it is pumped to a wastewater treatment unit. Resulting sludge is pumped to a sludge holding tank (2,025 gallon capacity). The sludge is vacuumed out and transported by Mr. Frank, Inc. to a Cyanokem landfill in ~~Deerland, MI~~ Detroit, MI. Treated effluent is discharged to the sanitary sewers and sludge is landfilled by Cyanokem.

Summary:
Crescent has the following violation(s) in its practices for hazardous waste management:

- Inappropriate LDR forms are used. The forms used do not include appropriate treatment standards for the waste generated. The LDR forms do not specify treatment standards as a technology, which is necessary for the D003 waste [40 CFR 268.7 (a)(1)(ii)].

Signature: Daniel Bruna

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. **List waste codes which the facility handles in each of the following LDR categories*:**

1. F001 through F005 spent solvents:

   _____

2. F020-F023 and F026-F028 dioxin-containing wastes:

   _____

3. California List Wastes (See Appendix A):

   _____

4. First Third Wastes [40 CFR 268.10]:

   F006

5. Second Third Wastes [40 CFR 268.11]:

   _____

6. Third Third Wastes [40 CFR 268.12]**:

   D003, D007 (Crescent incorrectly classifies these - see below)

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. **Waste Code Determination**

1. **Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?***

   Yes___ No✓

   If no, list below:

Assigned Classification	Correct Classification
D003, D007, F006	D006, F006

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: Manifest (1990) ID. as D003, D007, F006, but 1990 Annual Report only identifies F006. TCLP analysis of sludge shows cadmium (D006) level above limit. This waste was not included in the classification

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ___ No ✓ NA ___

Comments F006-listed D003, D007 - assigned as characteristic. Should be: D006, F006

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments _____

C. **Does the facility handle the following wastes (national capacity variances)?**

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A: (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ___ No ___ NA ✓

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

*Less than 1% by weight total organic carbon (TOC); or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments No F001 - F005 solvents

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ✓ NA ___

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments No dioxin wastes

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D003, D007, F006 ✓			✓ sludge

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments should be: D003, F006

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No ___ NA ___

c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ✓ NA ___

5. National Capacity Variance Wastes: If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply, complete the following table for each waste code, noting the date on which the national capacity variance expires.

Waste Code	Cal List Applicability	Expiration Date
____	_____	__/__/__
____	_____	__/__/__
____	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
____	_____	_____	_____
____	_____	_____	_____
____	_____	_____	_____

Comments_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. **Waste Analysis**

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___ (Go to 3.)

Comments _____

2. Which of the following methods does the generator use to make this determination (more than one may apply)?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]
D003, D007, F006 - General knowledge of wastewater treatment sludge used, based on TCLP analysis (should be D004, F006)

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

Sludge 1 10/23/90 - see attached results

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ✓ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ✓ NA ___

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ✓

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Scientific
CONTROL LABORATORIES, INC.
TESTING • RESEARCH • CONSULTING

3158 S. KOLIN AVENUE
CHICAGO, ILL 60623-4889
(312) 254-2406
FAX (312) 254-6661

GEN

REPORT TO: Crescent Plating
3650 West Armitage
Chicago, IL 60647

ATTENTION: Ms. Eileen Porps

REPORT NO: 47-881

RECEIVED: 10-02-90

TEST TYPE: Waste Analysis

REPORTED: 10-23-90

IDENTIFICATION OF MATERIAL:
One (1) waste sample, identified as:
- Two (2) bottles of sludge dated 10-02-90

PURPOSE:
The purpose of the testing is to determine if the submitted sample is hazardous as per 40 CFR, Part 261, Subpart C.

I. LEACHABLE METALS:

PROCEDURE:
The sample was leached and analyzed in accordance with USEPA SW-846. TCLP was performed per 40 CFR, Part 268, Appendix I.

RESULTS:

Parameter	Hazard ID No.	Characteristic "Hazard" Max	TCLP Analysis (mg/Kg)
Arsenic	D004	5.0	<0.1
Barium	D005	100.	<0.1
Cadmium	D006	1.0	12.4
Chromium	D007	5.0	1.8
Lead	D008	5.0	<0.05
Mercury	D009	0.2	<0.01
Selenium	D010	1.0	<0.1
Silver	D011	5.0	<0.05

N.R. = Not required due to low total
N/A = Not applicable

If the TCLP analysis is equal to or exceeds the Characteristic "Hazard" Max, the waste is a characteristic hazardous waste and is given the designation D-00_ from the first column. The waste requires "treatment" such as stabilization to meet these limits prior to disposal. The treatment standard for Selenium is 5.7, therefore additional "treatment" is required only if the analysis exceeds this value and not the Characteristic "Hazard" Max Limit.

Sa/m

If the waste is a listed waste (such as F006), the listed waste must meet its respective treatment limits prior to disposal regardless of whether the waste is a characteristic waste. The following are treatment limits for some common listed wastes:

Parameter:	F006	F019
Arsenic	N/A	N/A
Barium	N/A	N/A
Cadmium	0.066	N/A
Chromium	5.2	5.2
Lead	0.51	N/A
Mercury	N/A	N/A
Selenium	N/A	N/A
Silver	0.072	N/A
Nickel	0.32	N/A

II. TCLP ORGANICS:

PROCEDURE:

Analysis was performed in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical, SW-846, USEPA" Methods 8240 and 8270.

RESULTS:	TCLP Analysis Concentration in ppm	Non-Hazardous Limit
Benzene	<0.5	0.5
Carbon Tetrachloride	<0.5	0.5
Chlorobenzene	<100.	100.
Chloroform	<6.0	6.0
o Cresol	<10.0	200.
m Cresol	<10.0	200.
p Cresol	<10.0	200.
Cresol	<10.0	200.
1,4 Dichlorobenzene	<1.0	7.5
1,2 Dichloroethane	<0.5	0.5
1,1 Dichloroethylene	<0.7	0.7
2,4 Dinitrotolene	<0.1	0.13
Hexachlorobenzene	<0.08	0.13
Hexachlorobutadiene	<0.5	0.5
Hexachloroethane	<1.0	3.0
Methyl Ethyl Ketone	<200.	200.
Nitrobenzene	<0.1	2.0
Pentachlorophenol	<10.	100.
Pyridine	<1.	5.0
Tetrachloroethylene	<0.7	0.7
Trichloroethylene	<0.5	0.5
2,4,5 Trichlorophenol	<10.	400.
2,4,6 Trichlorophenol	<1.	2.0
Vinyl Chloride	<0.2	0.2

5b/m

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

By _____
Jeffrey Zak

JZ:cg
cc
FAX

3158 S. KOLIN AVENUE • CHICAGO, ILLINOIS 60623 • (312) 254-2406
FAX (312) 254-6661

Sc/m

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments_____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments_____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. **Management**

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ✓

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments_____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D001, F006	Cycle Kem Landfill - Detroit, MI
____	_____
____	_____

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ✓ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓ No tolling agreement

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ✓ No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ___ No ✓ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ___ No ___

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ___ No ___ NA ___

(If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

IMPROPER LDR FORMS - DON'T SPECIFY TREATMENT TECHNOLOGIES SPECIFICALLY FOR D003 CODE [40 CFR 268.7(a)(1)(ii)]

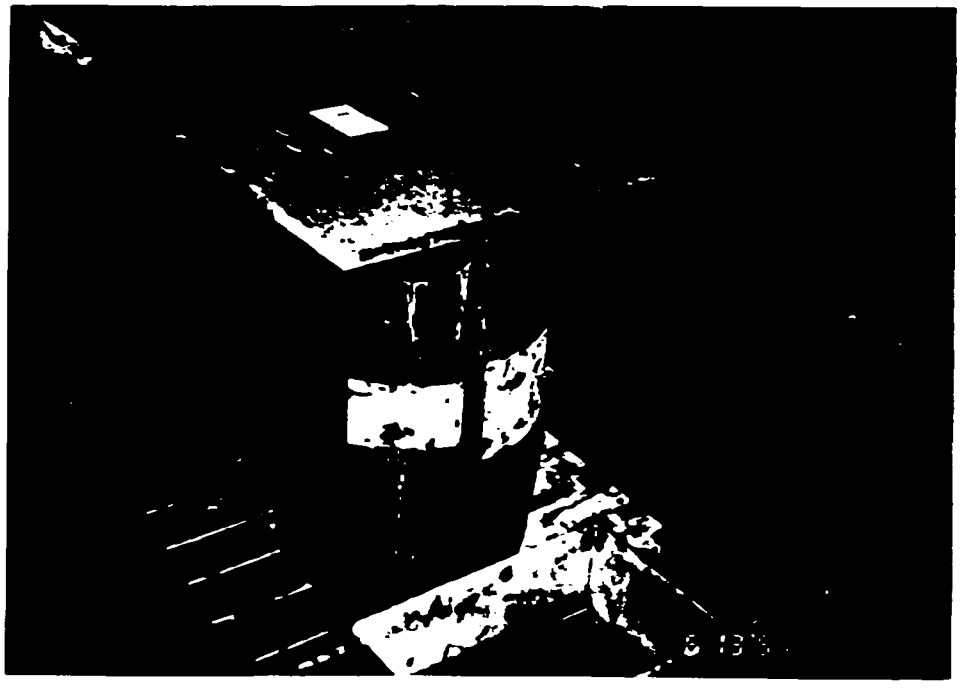
APPENDIX B

PHOTOGRAPHIC LOG

Illinois Environmental Protection Agency Photographs

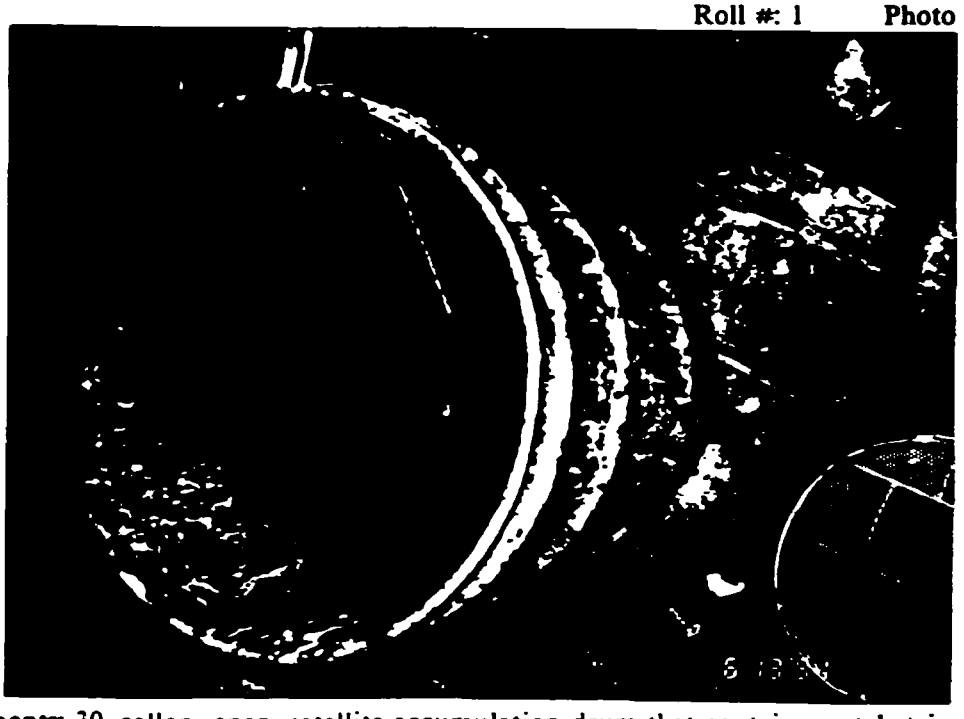
Site Name: Crescent Plating Works, Inc. Site #: ILD 005 097 621

Date: 6/13/91 Time: 12:40 PM Photographs Taken By: John Grabs, PRC



Comments: 55-gallon satellite accumulation drum that is not closed properly. The drum contains metal stripping waste in an EZ-OX (lime sulfur) solution.

Roll #: 1 Photo #: 1



Comments: 30-gallon, open, satellite accumulation drum that contains metal stripping waste in an EZ-OX solution.

Roll #: 1 Photo #: 2

VIEW ↑

Comments: Wooden walkway that covers floor drainage trench running the length of the first nickel plating area. The pumping area which pumps all wastewater to the wastewater treatment unit is shown to the right of the walkway.

Roll #: 1 Photo #: 3

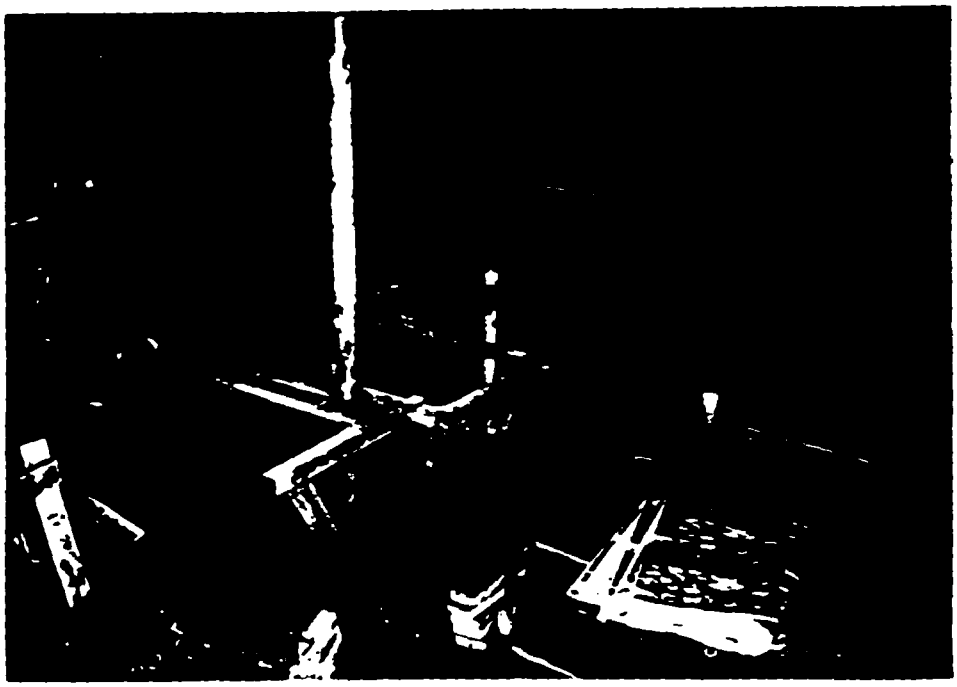
VIEW ↑

Comments: Wet concrete floor in packaging area (see text).

Roll #: 1 Photo #: 4

Comments: Wastewater treatment unit with 60,000-gallon settling tank in the background.

Roll #: 1 Photo #: 5



Comments: Open, 2,025-gallon sludge storage tank.

Roll #: 1 Photo #: 6